



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 26, 2024

BY ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
Daniel Patrick Moynihan U.S. Courthouse
New York, New York 10007

**Re: *United States v. Gregory Gumucio, Michael Anderson, and Haven Soliman,*
23 Cr. 595 (JPC)**

Dear Judge Cronan:

A pretrial conference is currently scheduled in this case for Tuesday, February 6, 2024, at 1:00 p.m. The parties jointly and respectfully request an adjournment of that conference for approximately 45 days. This is the parties' first request for an adjournment. By way of brief updates: The Government has issued a (pending) plea offer to defendant Gumucio and intends to produce certain material to him in the near term; the Government has had meaningful negotiations with defendant Anderson, which the parties intend to resume in the near term, following the conclusion of a trial that Anderson's counsel is engaged in; and the Government has produced more than one Terabyte of discovery to defendant Soliman. Accordingly, the requested adjournment will permit (as the case may be) the review of discovery and/or discussions about potential pretrial resolutions. On these bases (*i.e.*, discovery review and ongoing plea negotiations), the Government respectfully requests—with the consent of all three defendants—a corresponding exclusion of time pursuant to the Speedy Trial Act, until the next conference date. *See* 18 U.S.C. § 3161(h)(7)(A). Please let us know if any further information would be useful at this time.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: *Michael D. Neff*
Michael D. Neff
Assistant United States Attorney
(212) 637-2107

cc: All Counsel of Record (by ECF)